

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

Chapter 13

In re:

Case No.: 8:15-bk-10162

**KARL DUDLEY CRAWFORD and
CHERYL ANNETTE CRAWFORD,**

Debtors.

**DEBTORS' RESPONSE TO CREDITORS MARK AND COLLEEN REDIGER'S
REQUEST FOR PRODUCTION OF DOCUMENTS**

Debtors, **KARL DUDLEY CRAWFORD and CHERYL ANNETTE CRAWFORD**, by and through the undersigned counsel, hereby serve the Response to Creditors Mark and Colleen Rediger's Request for Production as follows:

1. **Will Produce.**
2. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly referred" to by the income tax returns filed by Crawford and CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted.
3. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to any and all books, records or other memoranda of business or financial conduct, activities, status or income of Crawford and CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted.
4. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to any and all deed, records, or other documents which relate to assets is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted.

5. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to any records of salaries, commissions, bonuses, income from employment, allowances, expenses, or any other sums of money is vague, ambiguous, overly broad, and imprecise. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term "Defendants" is subject to multiple interpretations, but not defined in the request.

6. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to the name(s) and address(es) of the person or persons who have custody of records of salaries, commissions, bonuses, allowances, expenses, or any other sums of money is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015.

7. **None in possession. Will produce when received.**

8. **Non in possession. Will produce when received.**

9. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to any items of personal property is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted. The term "Defendants" is subject to multiple interpretations, but not defined in the request.

10. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to any and all accounts is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted. The term "Defendants" is subject to multiple interpretations, but not defined in the request.

11. **OBJECTION.** Creditors' request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are "indirectly" referred to the name and address of the persons or entities is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how "indirectly referred" versus "directly referred" should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the

request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

12. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to the financial statements is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

13. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to the names and addresses of the persons is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

14. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to the each person or entity is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

15. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any and all personal or real property is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

16. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any

and all motorized vehicles is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

17. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any and all persons or entities is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

18. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any appraisal or any real or personal property is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

19. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any amount of money owed is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

20. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any legal cause of action is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

21. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained

for the purposes of the Requests. The request for documents that are “indirectly” referred to the name and address of the persons or entities is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

22. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to each person or entity who has served as the bank for defendants or CC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The date of the documents being requested, four (4) years from January 1, 2012 through December 31, 2015, is also ambiguous and imprecise because it is confusing whether the request is 4 years from January 1, 2012 or December 31, 2015. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

23. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any and all cash on hand is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

24. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any and all cash on hand for Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

25. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any accounts receivable owed to Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

26. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to notes receivable held by Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be

interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

27. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to the name and address of the persons or entities is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

28. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to bonds or other marketable securities owned by Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted.

29. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to real estate that the Defendants or CC owns is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

30. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to property that the Defendants claim as homestead is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

31. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any and all business in which Defendants or CCC is a partner, officer or principal owner or member is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

32. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any interest the Defendants or CCC may have is vague, ambiguous, overly broad, and imprecise.

Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

33. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any equipment that the Defendants or CCC owns is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred,” and “equipment” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

34. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to mortgage(s) upon which Defendants are liable is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

35. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred accounts payable owed by Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

36. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any other unpaid taxes for which Defendants or CCC is liable is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

37. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any assets held in trust is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

38. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained

for the purposes of the Requests. The request for documents that are “indirectly” referred to assets that are securing any debt for which the Defendants or CCC is liable is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

39. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to the Defendant’s or CCC’s obligation to pay leases, notes, or other debts of any other person or entity is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendant” is subject to multiple interpretations, but not defined in the request.

40. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any unsatisfied judgments against the Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

41. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any filing in bankruptcy by the Defendant is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted.

42. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any dividends payable to the Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

43. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any interest payable to the Defendants or CCC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted.

44. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained

for the purposes of the Requests. The request for documents that are “indirectly” referred to any royalties payable to the Defendants or CC is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

45. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any personal or business expense of Defendants is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

46. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any insurance payments Defendants or CC may have is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

47. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any other assets not already disclosed is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

48. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any other liabilities is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted.

49. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to any outstanding contracts is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

50. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for any will or trust executed by not revoked is

unintelligible. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

51. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The request for documents that are “indirectly” referred to real estate that the Defendants or CC owns is vague, ambiguous, overly broad, and imprecise. Debtors are unsure as to how “indirectly referred” versus “directly referred” should be interpreted. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

52. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

53. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

54. **OBJECTION.** Creditors’ request is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the Requests. The term “Defendants” is subject to multiple interpretations, but not defined in the request.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via [x] Email today, May, 31st, 2016 to Michael A. Nardella, Esq. at mnardella@nardellalaw.com and akeppel@nardellalaw.com

KAUFMAN, ENGLETT & LYND, PLLC

/s/ Roberto D. DeLeon

Roberto D. DeLeon, Esq.
Florida Bar No. 93901
111 N. Magnolia Avenue, Suite 1600
Orlando, FL 32801
Telephone No.: (407) 513-1900
Primary Email: rdeleon@kelattorneys.com
Secondary Email: KELinbox@kelattorneys.com
Attorney for Debtors Karl and Cheryl Crawford

Mailing List:

Karl D. Crawford
13905 Noble Park Drive
Odessa, FL 33556
Email: karlc143@yahoo.com